

1 Miles N. Clark, Esq.
2 Nevada Bar No. 13848
3 LAW OFFICES OF MILES N. CLARK, LLC
4 5510 S. Fort Apache Rd, Suite 30
5 Las Vegas, NV 89148
6 Phone: (702) 856-7430
7 Fax: (702) 552-2370
8 Email: miles@milesclarklaw.com

9 *Counsel for Plaintiff*
10 *Anne Blinn*

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 ANNE BLINN,

15 Plaintiff,

16 v.

17 CALIBER HOME LOANS, INC.;
18 DISCOVER BANK; EQUIFAX
19 INFORMATION SERVICES LLC;
20 EXPERIAN INFORMATION SOLUTIONS,
21 INC.; GOODLEAP LLC; NEWREZ LLC
22 DBA, SHELLPOINT MORTGAGE
23 SERVICING; and TRANS UNION LLC,

24 Defendants.

Case No. 2:25-cv-00501-GMN-MDC

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND BRIEFING DEADLINES ON
DEFENDANTS' PARTIAL MOTION TO
DISMISS AMENDED COMPLAINT FOR
FAILURE TO STATE A CLAIM**

[FIRST REQUEST]

Complaint filed: March 17, 2025

First Amended Complaint filed: May 6, 2025

Assigned to Hon. Judge Gloria M. Navarro

25 Plaintiff Anne Blinn ("Plaintiff"), by and through her counsel of record, and Defendants
26 NewRez LLC dba Shellpoint Mortgage Servicing and Caliber Home Loans, Inc. ("Defendants")
27 (collectively, the "Parties") hereby stipulate and agree as follows:

- 28 1. On March 17, 2025, Plaintiff filed a Complaint [Dkt. 1].
- 29 2. On April 22, 2025, Defendants filed a Partial Motion To Dismiss Complaint For
30 Failure To State a Claim [Dkt. 25].
- 31 3. On May 6, 2025, Plaintiff filed an Amended Complaint [Dkt. 32].
- 32 4. On May 20, 2025, Defendants filed a Partial Motion To Dismiss First Amended
33 Complaint For Failure To State a Claim [Dkt. 48].

1 5. Plaintiff's current deadline to respond to the motion is June 3, 2025.

2 6. Defendants' current deadline to file its Reply In Support of Partial Motion To
3 Dismiss For Failure To State a Claim is June 10, 2025.

4 The Parties have agreed to extend Plaintiff's deadline to respond by fourteen (14) days, to
5 **June 17, 2025**, due to Plaintiff's counsel's unavailability stemming from a family wedding out of
6 state during the first week of June. The Parties have further agreed to extend Defendants' deadline
7 to file a reply in support of their motion by fourteen (14) days, to **July 1, 2025**, for the same reason.

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1 This stipulation is submitted in good faith, not for the purpose of delay, and is not made
2 for any improper purpose.

3 **IT IS SO STIPULATED.**

4 DATED: May 23, 2025.

5 **LAW OFFICES OF MILES N. CLARK, LLC**

6 /s/ Miles N. Clark

7 Miles N. Clark, Esq.
8 Nevada Bar No. 13848
9 5510 So. Fort Apache Rd, Suite 30
10 Las Vegas, NV 89148
11 Email: miles@milesclarklaw.com

12 *Counsel for Plaintiff*
13 *Anne Blinn*

5 **ATLAS | SOLOMON LLP**

6 /s/ Natalie L. Winslow

7 Natalie L. Winslow, Esq.
8 Nevada Bar No. 12125
9 Melanie D. Morgan, Esq.
10 Nevada Bar No. 8215
11 7674 W. Lake Mead Blvd., Suite 220
12 Las Vegas, Nevada 89128
13 Email: nwinslow@atlas-solomon.com
14 Email: mmorgan@atlas-solomon.com

15 *Counsel for Defendants*
16 *Newrez LLC dba Shellpoint Mortgage*
17 *Servicing and Caliber Home Loans, Inc.*

14 **ORDER GRANTING**
15 **STIPULATION TO EXTEND BRIEFING DEADLINES ON DEFENDANTS' PARTIAL**
16 **MOTION TO DISMISS AMENDED COMPLAINT FOR FAILURE TO STATE A**
17 **CLAIM**

17 **IT IS SO ORDERED.**

18 DATED: 5-23-25

19 
20 U.S. MAGISTRATE JUDGE

21 *Blinn v. Caliber Home Loans, Inc. et al*
22 *Case No. 2:25-cv-00501-GMN-MDC*